

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

THEODORE MORAWSKI, as Next Friend
for A. M. (a minor), RODNEY BEASLEY,
and OTHERS SIMILARLY SITUATED

Plaintiffs,

v.

FARMERS TEXAS COUNTY MUTUAL
INSURANCE COMPANY; MID-
CENTURY INSURANCE COMPANY;
MID-CENTURY INSURANCE COMPANY
OF TEXAS; 21ST CENTURY NORTH
AMERICA INSURANCE COMPANY; 21ST
CENTURY PREFERRED INSURANCE
COMPANY; 21ST CENTURY
CENTENNIAL INSURANCE COMPANY;
21ST CENTURY INSURANCE COMPANY
OF THE SOUTHWEST; BRISTOL WEST
SPECIALTY INSURANCE COMPANY;
FOREMOST COUNTY MUTUAL
INSURANCE COMPANY; ZURICH
AMERICAN INSURANCE COMPANY

Defendants.

CIVIL ACTION NO. 2:13-CV-102

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

PLAINTIFF'S NOTICE OF VOLUNTARY DISMISSAL

COMES NOW Plaintiff, RODNEY BEASLEY, and pursuant to FRCP 41 (a)(1)(A), files
this Notice of Voluntary Dismissal, without prejudice and would respectfully show the Court the
following.

Plaintiff RODNEY BEASLEY was recently added as a new Plaintiff on March 11, 2014.¹ The Defendants have neither filed an Answer or a Motion for Summary Judgment. In accordance with FRCP 41 (a)(1)(A) and (B), this dismissal is effective immediately, and without prejudice.

Dated: March 31, 2014

By: /s/ Ron Vickery
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ATTORNEYS FOR PLAINTIFF
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¹ Plaintiff filed a Third Amended Complaint on March 11, 2014, (Dkt. No. 49) pursuant to a Motion for Leave to File a Third Amended Complaint, (Dkt. No. 48). Defendants filed an Opposition to the Motion for Leave to File a Third Amended Complaint on March 18, 2014, (Dkt. No 53). No other briefing has been filed in relation to this Third Amended Complaint.

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2014, I electronically filed the foregoing Plaintiff's Notice of Voluntary Dismissal with the Clerk of the Court using the CM/ECF system.

/s/ Ron Vickery
Ron Vickery